



## **TURK PRYSMIAN KABLO VE SISTEMLERİ A.S.**

### **"DISCLOSURE POLICY"**

#### **1. INTRODUCTION**

The purpose of this policy is to define Company rules pertaining to fulfilling our disclosure obligation in accordance with the regulations of the Capital Markets Board of Turkey (herein after shall be referred to as "S.P.K" for Sermaye Piyasası Kurulu in Turkish) and Istanbul Stock Exchange (herein after shall be referred to as "İ.M.K.B" for Istanbul Menkul Kıymetler Borsası in Turkish) in all applications targeting to provide information to public by Turk Prysmian Kablo ve Sistemleri A.S. (hereinafter shall be referred to as the "Company").

#### **2. INFORMATION AND DISCLOSURE DEMANDED**

In line with the codes, memorandums, and any other legislative items published as per the regulations of the S.P.K and those of the İ.M.K.B, Company must provide regularly and in a timely manner information and disclosure that is not trade secret and believed to be useful in ensuring the accurate functioning and operation of the SPK and the İMKB.

Trade Secret is identified as information, documents, electronic media relating to Company's economic achievements, efficiency structure and organization, financial, economical, creditability and cash status, research and development studies, manufacturing and technical specifications, pricing policies, marketing strategies and expenditure, market share and network, contractual relations subject or not subject to license and that are accessible only by limited number of Company personnel and employees who are engaged in Company's activities and of which disclosure to third parties and public is strictly restricted.

#### **3. RELEVANT DEPARTMENTS AND ADMINISTRATIVE RESPONSIBILITY**

Following departments have role and responsibility in this process: Administration & Control Department, Legal Affairs, Communications Department, and all other relevant departments.

Those who have administrative responsibility in relevant departments are those people who regularly access to Company's internal information directly or indirectly and have the capacity of taking administrative decisions that affect the future development and commercial targets of the Company.

#### **4. COMPANY PROCEDURE**

Administration & Control and Legal Affairs Departments submit the information that needs to be disclosed as well as the timing information for such disclosure to relevant Department Managers. Relevant Department Managers are expected to submit the information to Administration & Control and Legal Affairs Departments, where Investor Relations function takes place at once and on real time basis and to warrant the accuracy of provided information.

Company may postpone the public disclosure of internal information in order to prevent any damage to legitimate interests of the Company provided that such postponement does not result in misleading of the public and further provided that Company is able to keep such information confidential. Any other information or changes thereof shall be notified to the Platform for Providing Public Information (hereinafter shall be referred to as the "KAP" for Kamuyu Aydınlatma Platformu in Turkish) as soon as the need for disclosure obligation arises or becomes known.

Legal Affairs Department, in cooperation with Administration & Control Department, may – when necessary and essential, assesses and verifies whether the disclosure of the information to KAP system and making special case disclosures are necessary.

Monitoring of news and rumors about the Company published in press/media and/or the internet sites is carried out on daily basis by the Communications Department and notification is made to Administration & Control and Legal Affairs Departments. Administration & Control and Legal Affairs Departments collaborates and assesses whether these news and information have the quality and content that would affect the value of capital market instruments and the investment decisions of the potential and current investors or whether such information and news differ from those that were communicated to public previously by means of public disclosure documents. Further to such assessment, if making an announcement about the news and rumor that does not bring about a special case disclosure as per the memorandum is still desired, announcement is made in the manner that applies to announcements which are essential as per the provisions of the Memorandum.

Especially in cases where significant events and developments that would affect the value of capital market instruments being traded in I.M.K.B and accordingly investment decisions of the investors take place, Administration & Control Department and Legal Department are responsible for writing the text of any announcements that will be made on basis of the information provided by the relevant Department Directors & Managers.

Finally, Administration & Control Department and Legal Affairs Department, together with Communications Department, send announcements that include information that might affect the value of capital market instruments and investment decisions of the investors to the KAP System and makes sure that aforementioned announcements were received by KAP System.

Communication with the participants of the capital market shall only be maintained by those persons who were explicitly authorized to make public announcements and disclosures on behalf of the Company by the Board of Directors. Company shall refrain to discuss any information, other than information that was disclosed to public, with real and legal persons outside the Company, notifies its employees to this effect, and binds those persons who have access to such information on grounds of their employment by means of non-disclosure agreements, and does not make any leading or direction in terms of the expectations relating to Company's activities other than those were allowed by the legislation for making public disclosures.

Information submitted to KAP System is published on Company's internet site by Administration & Control Department and later Communication Department shares the content of press releases that relate to aforementioned events with Administration & Control Department and Legal Affairs Department, finally submitting pres releases to press agencies in cases where it is obligatory as per than up-to-date regulations.

Following titles is presented to the attention of the investors in the Company's Internet site:

- Trade registry information,
- Latest status of partnership structure,
- Latest status of Board of Directors, Members of Auditors' Board and top level executives,
- Latest status of the Company's Articles of Association (AOA) and date / number of the Trade Registry Gazette where the amended form of the AOA is published,
- Annual Reports for the last four years,
- Declaration of Special Status,
- Corporate Governance Observance Report,
- Attendance list, agenda and minutes of General Assembly meetings held during the last four years,
- Proxy format,
- Periodical financial tables and independent audit reports,
- Public offering explanations and circulars,
- News and frequently asked questions.

Presentations and reports disclosed in introduction and disclosure meetings held with capital market participants or in press meetings held in parallel with events and developments shall be accessible at Company's corporate internet site.